

Robert B. Wilson  
Chapter 13 Trustee  
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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION**

IN RE:

CASE NO: 18-70016

CODY DON GOINS  
MARQIE MEGAN GOINS

PREHEARING DATE: December 17, 2019  
PREHEARING TIME: 2:00 pm

DEBTOR(S)

**AMENDED NOTICE OF AMOUNT DEEMED NECESSARY TO CURE MORTGAGE ARREARS  
(per Local Bankruptcy Rule 3002-2)  
RESPONSE REQUIRED BY CREDITOR**

**PURSUANT TO LOCAL BANKRUPTCY RULE 3002-2(c), ON OR BEFORE THE CLOSE OF BUSINESS 10/26/2019 WHICH IS AT LEAST SIXTY (60) DAYS FROM THE DATE OF SERVICE OF THE NOTICE, THE HOLDER OF A CLAIM COVERED BY THE NOTICE SHALL FILE A WRITTEN RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT 1100 COMMERCE ST STE 1254 DALLAS, TX 75242 AND SHALL SERVE THE RESPONSE UPON THE DEBTOR, DEBTOR'S ATTORNEY AND THE TRUSTEE. IF A RESPONSE IS TIMELY FILED, A PREHEARING SHALL BE DEEMED REQUESTED. THE PREHEARING SHALL BE HELD AT THE DATE AND TIME STATED ABOVE. THE LOCATION FOR THE PREHEARING IS:**

PRE-HEARING CONFERENCE  
US COURTHOUSE ROOM 303  
10TH AND LAMAR STREETS  
WICHITA FALLS, TX 76301

PARTIES MAY ATTEND THE PRE-HEARING BY PHONE. PLEASE  
CONTACT THE TRUSTEE'S OFFICE FOR DIALING INFORMATION AT  
LEAST 7 DAYS PRIOR TO THE PRE-HEARING DATE.

THE RESPONSE SHALL INDICATE WHETHER THE HOLDER DISPUTES THE INFORMATION CONTAINED IN THIS NOTICE. THE RESPONSE SHALL ALSO ITEMIZE ANY CURE AMOUNTS OR POST-PETITION ARREARAGES THAT THE HOLDER CONTENDS EXIST ON THE DATE OF THE RESPONSE.

PURSUANT TO LOCAL BANKRUPTCY RULE 3002-2(e), IF NO RESPONSE IS FILED, THE INFORMATION CONTAINED IN THIS NOTICE SHALL BE DEEMED UNOPPOSED OR UNDISPUTED, AND THE COURT SHALL ENTER AN ORDER BY DEFAULT FINDING: 1) TRUSTEE'S STATEMENTS OF ANY PLAN DELINQUENCY AMOUNT AND SUMMARY OF PAYMENTS ARE CORRECT AND 2) THE DEBTOR'S ONGOING POST-PETITION MORTGAGE PAYMENTS ARE CURRENT.

THE ENTRY OF SUCH AN ORDER SHALL PRECLUDE THE HOLDER OF THE CLAIM FROM ASSERTING CURE AMOUNTS OR POST-PETITION ARREARAGES THAT ALLEGEDLY ACCRUED BEFORE THE DATE OF THIS NOTICE IN ANY CONTESTED MATTER OR ADVERSARY PROCEEDING IN THIS CASE OR IN ANY OTHER MANNER OR FORUM AFTER DISCHARGE IN THIS CASE, UNLESS THE COURT DETERMINES, AFTER NOTICE AND HEARING THAT THE FAILURE WAS SUBSTANTIALLY JUSTIFIED OR IS HARMLESS.

Pursuant to Local Rule 3002-2(b), the Chapter 13 Trustee files this Notice of Amount Deemed Necessary to Cure Mortgage Arrears ('Notice').

To the Trustee's knowledge, the Debtor has a current PLAN PAYMENT DELINQUENCY amount of \$ 0 .00.

**SUMMARY OF PAYMENTS**

<u>Account Number</u>	<u>Claim Asserted</u>	<u>Claim Allowed</u>	<u>Principal Paid</u>	<u>Interest Paid</u>	<u>Total Paid by Trustee</u>	<u>Delinquency</u>
<b>21ST MORTGAGE CORPORATION</b>						
<b>( 295 MORGAN RD- MOBILE HOME )</b>						
1555	36,999.02	\$36,999.02*	0.00	0.00	0.00	0.00

Date: August 27, 2019

/s/ Marc McBeath

Marc McBeath, Bar # 13328600  
Staff Attorney  
Robert B. Wilson, Bar # 21715000  
Chapter 13 Trustee

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing document was served on this date to the following parties either electronically or by U.S. First Class Mail.

21ST MORTGAGE CORPORATION PO BOX 477 KNOXVILLE, TN 37901  
BURKBURNETT ISD 100 N AVENUE D BURKBURNETT, TX 76354-3509  
CODY DON GOINS MARQIE MEGAN GOINS 295 Morgan Rd Burkburnett, TX 76354  
FIRST CAPITAL BANK PO BOX 9328 WICHITA FALLS, TX 76308  
MONTE J WHITE ATTORNEY AT LAW 1106 BROOK AVE HAMILTON PLACE WICHITA FALLS, TX 76301  
PRA Receivables Management, LLC PO Box 41021 Norfolk, VA 23541  
WICHITA COUNTY 600 SCOTT AVE SUITE 103 WICHITA FALLS, TX 76301

Date: August 27, 2019

/s/ Marc McBeath

Marc McBeath, Bar # 13328600  
Staff Attorney  
Robert B. Wilson, Bar # 21715000  
Chapter 13 Trustee

